

Nicole M. Norris (SBN 222785)
WINSTON & STRAWN LLP
101 California Street, Suite 3900
San Francisco, CA 94111-5894
Telephone: 415-591-1000
Facsimile: 415-591-1400
Email: nnorris@winston.com

James F. Hurst (*Admitted Pro Hac Vice*)
David J. Doyle (*Admitted Pro Hac Vice*)
Samuel S. Park (*Admitted Pro Hac Vice*)
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601-9703
Telephone: 312-558-5600
Facsimile: 312-558-5700
Email: jhurst@winston.com; ddoyle@winston.com;
spark@winston.com

Charles B. Klein (*Admitted Pro Hac Vice*)
WINSTON & STRAWN LLP
1700 K Street, N.W.
Washington, D.C. 20007
Telephone: 202-282-5000
Facsimile: 202-282-5100
Email: cklein@winston.com

Attorneys for Defendant
ABBOTT LABORATORIES

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

MEIJER, INC. & MEIJER DISTRIBUTION,
INC., on behalf of themselves and all others
similarly situated,) **Case No. C 07-5985 CW**
Plaintiffs,) *Related by Order to:*
vs.)
ABBOTT LABORATORIES,) **Case No. C 04-1511 CW**
Defendant.)
[caption continues next page]) **DECLARATION OF CHARLES B. KLEIN
IN SUPPORT OF ABBOTT
LABORATORIES' MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
INTERROGATORY RESPONSES**
Date: June 5, 2008
Time: 2:00 p.m.
Courtroom 2
The Honorable Judge Wilken

ROCHESTER DRUG CO-OPERATIVE, INC.,)
on behalf of itself and all others similarly)
situated,)
Plaintiffs,)
vs.)
ABBOTT LABORATORIES,)
Defendant.)
LOUISIANA WHOLESALE DRUG)
COMPANY, INC., on behalf of itself and all)
others similarly situated,)
Plaintiffs,)
vs.)
ABBOTT LABORATORIES,)
Defendant.)
Case No. C 07-6010 CW
Related by Order to:
Case No. C 04-1511 CW
**DECLARATION OF CHARLES B. KLEIN
IN SUPPORT OF ABBOTT
LABORATORIES' MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
INTERROGATORY RESPONSES**
Date: June 5, 2008
Time: 2:00 p.m.
Courtroom 2
The Honorable Judge Wilken
Case No. C 07-6118 CW
Related by Order to:
Case No. C 04-1511 CW
**DECLARATION OF CHARLES B. KLEIN
IN SUPPORT OF ABBOTT
LABORATORIES' MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
INTERROGATORY RESPONSES**

The Honorable Judge Wilken

1 I, Charles B. Klein, declare:

2 1. I am an attorney at law, admitted to practice in this Court for this matter. I am
3 a partner with the law firm of Winston & Strawn LLP, counsel of record for Abbott Laboratories,
4 and I am authorized to make this Declaration in that capacity.

5 2. I submit this declaration in support of Abbott's Motion to Compel Production
6 of Documents and Interrogatory Responses. The statements contained herein are based on my own
7 personal knowledge unless otherwise stated.

8 3. A true and correct copy of a portion of the Declaration of Douglas Greer,
9 previously filed in the *In re Abbott Laboratories Norvir Antitrust Litig.*, Case No. 04-1511 is
10 attached hereto as **Exhibit A**.

11 4. A true and correct copy of Plaintiffs' responses and objections to Abbott
12 Laboratories Interrogatories is attached hereto as **Exhibit B**.

13 5. A true and correct copy of Plaintiffs' responses and objections to Abbott
14 Laboratories Requests for Production is attached hereto as **Exhibit C**.

15 I declare under penalty of perjury under the laws of the United States of America that
16 the foregoing is true and correct.

17 Executed in Washington D.C, this 12th day of May, 2008.

18
19 /s/ Charles B. Klein

20 _____
21 Charles B. Klein
22 Attorney for Defendant Abbott Laboratories
23
24
25
26
27
28